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VIA ECF AND FACSIMILE (973-297-4906)

Honorable Madeline C. Arleo, U.S.M.J. King Fed. Bldg. & United States Courthouse 50 Walnut Street P.O. Box 999 Newark, New Jersey 07101-0999

Re: North Jersey Surgery Center v. Horizon Blue Cross Blue Shield of N.J. et al.,

Docket No.: 2:12-cv-07131 (SDW)(MCA)

Dear Judge Arleo:

This firm represents defendant United Parcel Service of America ("UPSOA"), improperly pleaded in the Complaint as "United Parcel Service," in the above-captioned matter. With the consent of plaintiff's counsel, I write to respectfully request a 30-day extension of time to answer, move, or otherwise respond to plaintiff's Complaint. This extension will provide UPSOA additional time to investigate the allegations in this matter.

Defendant UPSOA's deadline is December 7, 2012. If Your Honor grants this extension, UPSOA will answer, move, or otherwise respond to the Complaint on or before January 7, 2013.

Thank you for your attention to this matter.

Respectfully submitted,

Heather Weine Brochin

Encl.

cc: Andrew R. Bronsnick, Esq. (via first class mail)